

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WADLEY PIERRE,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE, MARTIN BESLIN,
and RICHARD SPINGEL,

Defendants.

C.A. No. 13-12055-MLW

JURY DEMAND

AFFIDAVIT OF JOSEPH SULMAN

I, Joseph Sulman, hereby depose and state as follows:

1. I am the current counsel for the Plaintiff in this matter and duly licensed to practice in the Commonwealth of Massachusetts and before this District Court. I provide the following information based on my personal knowledge.

2. Over the course of the past month, through various meetings and conversations between myself and Plaintiff Wadley Pierre, it has become apparent that there is a breakdown in our attorney-client relationship. Although I tried to save the relationship, it became clear this week that Mr. Pierre and I could no longer work together.

3. Before I formally seek to withdraw, I would like to provide Mr. Pierre with time to retain new counsel. I am assisting him in this effort.

4. Defendant's partial motion to dismiss is now pending. Due to the breakdown in my relationship with Mr. Pierre, I have not worked on responding to the motion, as I felt it would be inappropriate for me to do so due to the status of our relationship.

5. I informed opposing counsel that I intended to request an extension of time to respond to the motion to dismiss to allow Mr. Pierre to retain new counsel, and he indicated that the Defendants do not oppose the request.

Signed under the pains and penalty of perjury, this 8th Day of November, 2013.

/s/ Joseph Sulman
Joseph Sulman

CERTIFICATE OF SERVICE

I hereby certify that I served this document on all counsel of record by ECF on November 8, 2013.

/s/ Joseph Sulman
Joseph L. Sulman, BBO #663635